

# Exhibit 1

Letter from Jonathan M. Shaw to  
Eric L. Cramer dated May 24, 2019



May 24, 2019

**VIA ELECTRONIC MAIL**

Eric L. Cramer, Esq.  
Berger & Montague, P.C.  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
ecramer@bm.net

Re: *Le v. Zuffa, et al.*, Case No. 15-cv-01045-RFB-PAL

Dear Eric:

To supplement the column of Zuffa's exhibit list indicating which documents Zuffa believes should be sealed at the upcoming evidentiary hearing, I write to advise you of the criteria it has applied in determining which of the exhibits on its list should be sealed:

1. Zuffa will seek to seal all of its contracts with its athletes and documents quoting language from those contracts. So that there is no confusion, Zuffa will not move to seal material referring to but not quoting from its contracts with its athletes.
2. Zuffa will seek to seal post-2013 financial materials.
3. Zuffa will seek to seal post-2013 trade-secret materials—e.g., internal valuations, analyses, projections, and strategies.
4. Zuffa will seek to seal sensitive, private third-party information, such as information concerning fighter injuries or third-party personal information, including phone numbers and addresses.

Finally, Zuffa will maintain under seal any material produced by a third party with a "Confidential" or "Highly Confidential" designation, pending the objections or consent of each such third party.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'JM Shaw'.

Jonathan M. Shaw, Esq.

cc: Kevin Rayhill, Esq.  
Patrick Madden, Esq.  
Mark Suter, Esq.